

(Caption of Case)

Application of South Carolina Electric & Gas
Company for a Certificate of Environmental
Compatibility and Public Convenience and Necessity
for the Construction and Operation of a 230 kV
Transmission Line from Its V.C. Summer
Switchyard to Its Killian Transmission Substation
and Two 230 kV Transmission Lines from Its V.C.
Summer Switchyard #2 to Its Lake Murray
Transmission Substation

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2011 -325 - E

(Please type or print)

Submitted by: Danny C. CroweSC Bar Number: 1480

Address:

Turner Padgett Graham & Laney,
P.A.

Telephone:

803-227-4239Post Office Box 1473

Fax:

803-400-1471Columbia, SC 29202

Other:

Email: dcrowe@turnerpadgett.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input checked="" type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: <u>OK</u>
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

RETURN DATE: OK
SERVICE: OK

TURNER PADGET

TURNER PADGET GRAHAM & LANEY P.A.

CHARLESTON
COLUMBIA
FLORENCE
GREENVILLE
MYRTLE BEACH

REPLY TO:

Danny C. Crowe

E-Mail: DCrowe@TurnerPadget.com
Writer's Direct Dial: (803) 227-4239
Direct Fax: (803) 400-1471

October 18, 2011

VIA HAND DELIVERY

Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Suite 100
Columbia, SC 29210

Re: Application for South Carolina Electric & Gas Company for a Certificate of
Environmental Compatibility and Public Convenience, etc.
Docket No. 2011-325-E

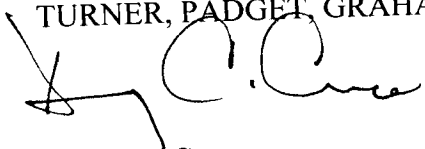
Dear Ms. Boyd:

Enclosed for filing on behalf of the Town of Blythewood in the above-referenced matter is the Surrebuttal Testimony and Exhibits of John P. Perry, along with an attached Certificate of Service. Please file the originals and return a clocked copy of these documents to our courier.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.


Danny C. Crowe

DCC/lb
Enclosure

BUSINESS • LITIGATION • SOLUTIONS

Bank of America Plaza • 17th Floor • 1901 Main Street (29201) • PO Box 1473 • Columbia, SC 29202
Phone (803) 254-2200 • Fax (803) 799-3957 • turnerpadget.com

October 18, 2011

Page 2

cc: K. Chad Burgess, Esquire
Matthew W. Gissendanner, Esquire
Shannon Bowyer Hudson, Esquire
Jeffrey M. Nelson, Esquire
Carlisle Roberts, Esquire
Duane Parrish
John E. Frampton
Belton T. Zeigler, Esquire
(all with enclosures)

SURREBUTTAL TESTIMONY OF
JOHN P. PERRY
ON BEHALF OF
THE TOWN OF BLYTHEWOOD
DOCKET NO. 2011-325-E

Q. PLEASE STATE YOUR NAME AND POSITION FOR THE RECORD.

A. My name is John P. Perry. I am the Town Administrator for the Town of Blythewood.

Q. HAVE YOU PREVIOUSLY SUBMITTED DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to respond to matters raised in the pre-filed rebuttal testimony of the SCE&G witnesses. The rebuttal testimony of SCE&G's witness Stephan A. Byrne appears to be offered to tell the Commission that the Commission has no choice in determining the route, and that the siting of the Winnsboro-Blythewood line segment cannot be changed. The rebuttal testimony of SCE&G's agent, Dwight M. Hollifield, as it relates to the objections of the Town of Blythewood, asserts that the Town's testimony regarding the adverse visual impact of the proposed lines is simply wrong. The rebuttal testimony of Hubert C. Young, III, criticizes the idea of undergrounding the lines and offers cost estimates for undergrounding a length of line far in excess of any length suggested by the Town. In addition, it belittles the financial

1 contributions of the Town (and SCDOT) for improvement of the I-77 Exit 27
2 intersection.

3 **Q. WHAT IS YOUR RESPONSE TO THE TESTIMONY OF SCE&G'S BYRNE**
4 **CONCERNING THE LINE SITING PROCESS?**

5 A. The Town of Blythewood (by me as its Town Administrator and/or its Planning
6 Director Michael Criss) attended all of SCE&G's line siting "community workshops" for
7 the Winnsboro-Killian line. These included a "workshop" on April 15, 2010, specifically
8 for the Winnsboro-Blythewood segment. See the March 31, 2010 letter of SCE&G's
9 Robert C. Lindler attached to this Surrebuttal Testimony as Perry Exhibit 8, the
10 December 22, 2010 letter of Lindler attached to my pre-filed Direct Testimony as Perry
11 Exhibit 6, and the January 4, 2011 letter of Lindler attached to this Surrebuttal Testimony
12 as Perry Exhibit 9.

13 A review of these letters, as well as the Rebuttal Testimony of Byrne and
14 Hollifield, leads to the reasonable conclusion that any alleged public input in line siting
15 of the Winnsboro-Killian segment was a sham. In his Rebuttal Testimony, Hollifield
16 testified that SCE&G had alternate routes for the six-mile Blythewood-Killian line
17 segment by March 16, 2010. (Page 5, lines 4-11). However, by the time of its April 15,
18 2010, "community workshop" on the Winnsboro-Blythewood segment, SCE&G had not
19 developed any alternate routes for the 31-mile Winnsboro-Blythewood segment. See the
20 second paragraph of Lindler's March 31, 2010 letter, Perry Exhibit 8 ("Although no
21 alternate route corridors have been developed at this time, they will be located in the
22 siting study area"). "Alternate route development" is phase one of SCE&G's three-phase
23 Transmission Line Siting Process (Rebuttal Testimony of Dwight M. Hollifield, page 2,

1 line 21 through page 3, line 2). This means, assuming the truthfulness of Lindler's letter,
2 that SCE&G had not even accomplished phase one of its own Transmission Line Siting
3 Process for the Winnsboro-Blythewood segment by the beginning of the second quarter
4 of 2010.

5 Yet, "by the third quarter of 2010, SCE&G determined that all four (4) of the new
6 230 kV lines could be built within existing rights-of-way, with one minor exception."
7 (Exhibit A to SCE&G Application, page 7). See also, the Rebuttal Testimony of Stephen
8 A. Byrne, at page 9, line 11 through page 10, line 17, concerning SCE&G's
9 "understanding" after April 2010 with agencies involved in the EIS process that SCE&G
10 would use existing rights-of-way. Although SCE&G asserted in Exhibit A of its
11 Application (page 7), that it developed 24 alternate routes for the Winnsboro-Blythewood
12 segment, none have been provided to the Town or to this Commission.

13 The reasonable conclusion from this is that SCE&G intentionally delayed
14 developing alternate routes for the Winnsboro-Blythewood segment and then reached an
15 "understanding" for NRC purposes on use of existing rights-of-way. SCE&G now
16 attempts to present a *fait accompli* to this Commission on the location of the Winnsboro-
17 Blythewood segment, including the crossing of Blythewood Road at Exit 27. This
18 appears to be the situation despite SCE&G's highly-touted "public participation" and its
19 private process during which SCE&G met several times with Town officials, both before
20 and after announcement of the Winnsboro-Blythewood route. SCE&G has offered to the
21 Town and the Commission no alternate route for the Winnsboro-Blythewood segment.
22 SCE&G now informs both these governmental bodies that there can be no alternate route,
23 despite the requirement of S.C. Code Section 58-33-160(1)(c) for the Commission's

1 consideration of “the various alternatives.” It appears that SCE&G has created its own
2 time exigencies, and now argues that there are no alternate routes because there is no time
3 for alternate routes.

4 **Q. WHAT IS YOUR RESPONSE TO THE TESTIMONY OF SCE&G’S AGENT**
5 **HOLLIFIELD?**

6 I question whether his rebuttal opinion of “minor visual condition changes” (page
7 37, line 21) would be different if six stacked power lines were run outside the windows of
8 his office in Charlotte. The photographic simulations attached to my direct testimony as
9 Perry Exhibits 4 and 5 clearly show the visual clutter of a virtual curtain of power lines.
10 As to the Town’s proposal to cross over I-77 and locate the proposed lines on the west
11 side of I-77 Exit 27, Mr. Hollifield fails to acknowledge that the west side is less
12 commercially developed than the east side, and that the 115 kV would be relocated with
13 the 230 kV line. He also fails to consider that I-77, in the vicinity of the Town, is already
14 crossed by multiple power lines in at least two locations. His testimony as to appropriate
15 management of “visual impacts” is stunningly ironic given the line path he proposes.

16 **Q. WHAT IS YOUR RESPONSE TO THE TESTIMONY OF SCE&G’S YOUNG AS**
17 **TO COSTS?**

18 Mr. Young’s seven-page attack on the concept of undergrounding is misplaced
19 and the estimated costs are unsupported by any submitted evidence. The two-line
20 suggestion of undergrounding as “an ideal” on page 3 of Mayor Bailey’s direct testimony
21 was in reference to crossing Blythewood Road, which is a far less distance than the four-
22 tenths of a mile distance used in Mr. Young’s calculations. Similarly, no cost
23 documentation is offered by Mr. Young for the re-routing suggested by the Town.

1 Mr. Young's criticism of the amount of the Town's expenditures and SCDOT's
2 expenditures for enhancements to the appearance of Exit 27 is inappropriate. An
3 expenditure of \$175,000 is very significant to a Town with a total annual budget from all
4 sources of \$1,778,000. (See Perry's Direct Testimony at page 2-3 and Bailey Exhibit 1 to
5 his Direct Testimony).

6 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

7 Yes.

Perry Exhibit 8



March 31, 2010

Dear Area Property Owners and Residents:

SCE&G and the South Carolina Public Service Authority (Santee Cooper) are planning to build and operate two new nuclear generating units at their existing V.C. Summer Nuclear Station in Jenkinsville, SC. The new units are necessary to maintain an adequate supply of reliable electrical energy throughout central and southern South Carolina. Both SCE&G and Santee Cooper must build several new 230 kV transmission lines that will carry the generated electricity throughout their electrical service areas. One of the lines SCE&G must build is the V. C. Summer Nuclear Station-Killian 230kV line. This new "power line" will run between V. C. Summer Nuclear Station and SCE&G's existing Killian 230kV transmission substation.

SCE&G's project team has begun a comprehensive siting process to determine a final route for the Winnsboro-Blythewood segment of the new line. A siting study area has been identified and is shown on a map that is printed on the back of this letter. According to current records, you are an owner of property in the siting study area. Although no alternate route corridors have been developed at this time, they will be located in the siting study area.

While developing alternate route corridors that will be carefully evaluated before selecting the final route, SCE&G considers an array of environmental, land use, aesthetic and cultural resource factors. Also, we have found that property owners and residents in the siting study area often have important information that should be considered. For that reason, SCE&G will conduct a community workshop on Thursday, April 15, 2010 to give you an opportunity to meet with our project team, learn about our siting process and share information you believe should be considered while developing the alternate route corridors. The workshop will be informal, and we invite you to drop by anytime between 4 p.m. and 7 p.m. The workshop location is:

**St. Luke Baptist Church
183 St. Luke Church Road
Winnsboro, SC 29180**

Enclosed is a survey you may use to provide our project team information that will be considered in the siting process. Thank you in advance for taking a few minutes to complete it. You may bring the completed survey to the workshop, complete it while there, or return it in the enclosed envelope no later than April 23, 2010. You will be invited to a second community workshop once alternate route corridors for the new transmission line have been determined.

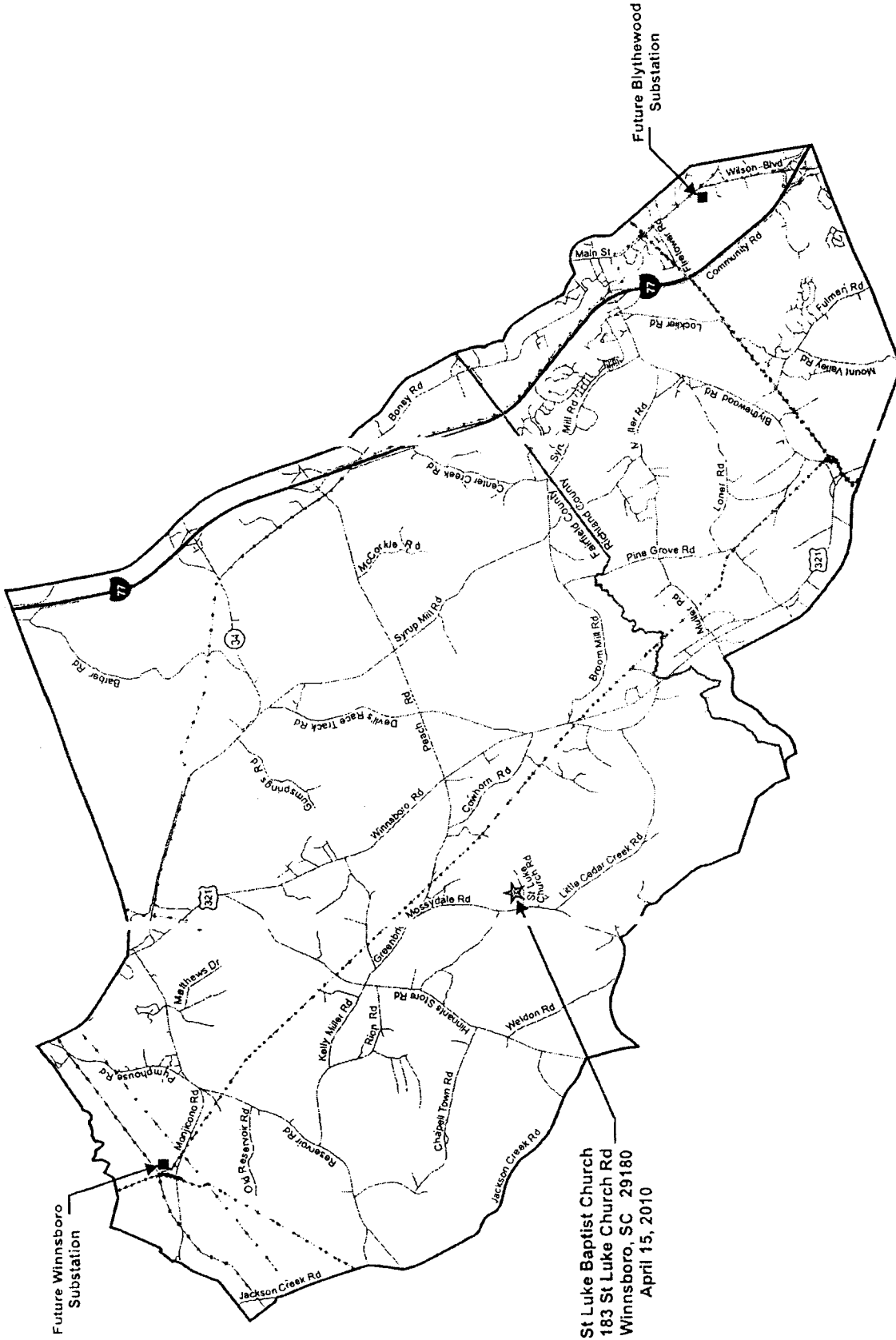
We look forward to seeing you at the community workshop on April 15th. If you have questions in the meantime, please call 1-866-865-1466 at your convenience and record your question. Leave your name, telephone number and address, and a SCE&G representative will return your call in a timely manner.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert C. Lindler".

Robert C. Lindler
Manager, Transmission Siting, Surveying & Permitting

Enclosures



St Luke Baptist Church
 183 St Luke Church Rd
 Winnsboro, SC 29180
 April 15, 2010

- Legend**
- Road
 - Interstate Highway
 - County Line
 - Existing Electrical Transmission Line
 - Study Area Boundary



SITING STUDY AREA MAP

Winnsboro - Blythewood
 230 kV Line Segment

Fairfield and Richland Counties, South Carolina



January 4, 2011

Dear Area Property Owners and Residents:

Re: Winnsboro-Blythewood Transmission Line Siting Study Update
Route Selection Decision

I hope you had an opportunity to attend the community workshop SCE&G conducted on April 15, 2010 as part of our siting process for the future Winnsboro-Blythewood 230 kV transmission line. As we explained in the invitation letter announcing the community workshop, this future line is a segment of the V.C. Summer-Killian 230 kV Line. This new line will deliver a portion of the electricity generated by the two new nuclear generating units to be built near the existing V.C. Summer Nuclear Station to the SCE&G electrical system. The invitation also noted that a second community workshop would be held following the development of alternate routes for the future line.

This letter is to inform you that our siting study for the future line route, which included a thorough engineering review of existing rights-of-way, has led to a decision regarding the route for the future line. We have determined the future Winnsboro-Blythewood 230 kV Line can be built within an existing SCE&G right-of-way that runs between the Winnsboro and Blythewood areas. The single poles that currently carry a 115 kV line within this existing right-of-way will be removed and replaced with new single poles designed to carry both the 115 kV line and new 230 kV line. As a result of this decision, a continuation of further phases of our siting process to select a new transmission line route, to include the second community workshop, is unnecessary.

To those of you that attended the community workshop on April 15th and/or completed and returned the Community Surveys to us, we are very grateful. In fact, utilizing existing right-of-way rather than developing a new route is very much in keeping with many comments we heard at the workshop and received on the surveys. If you have questions, you may call 1-866-865-1466 and leave your name, telephone number and a brief message. An SCE&G representative will return your call in a timely manner.

Best regards,

A handwritten signature in black ink, appearing to read "Robert C. Lindler". The signature is fluid and cursive.

Robert C. Lindler
Manager, Transmission Siting, Surveying & Permitting

CERTIFICATE OF SERVICE

I, Lynne Bennink, an employee of Turner, Padget, Graham & Laney, P.A., do hereby certify that I have served all counsel and parties in this action with a copy of the **Surrebuttal Testimony and Exhibits of John P. Perry** by e-mailing and mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

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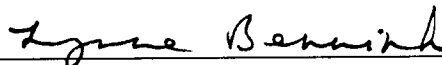
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Lynne Bennink
Secretary to Danny C. Crowe

October 18, 2011